



SHER TREMONTE LLP

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/7/20

December 23, 2019

BY ECF

The Honorable Kimba M. Wood
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Reinaldo Roman
Case No. 19 Cr. 116 (KMW)

Dear Judge Wood:

We write on behalf of Reinaldo Roman, defendant in the above-referenced action, to request a one-month adjournment of his sentencing hearing, currently scheduled for January 23, 2020. We request the adjournment to afford the defense additional time to investigate various mitigation arguments and prepare for sentencing. Accordingly, we respectfully request that the Court reschedule the sentencing for a date during the last week of February 2020 or a later date that is convenient for the Court. This is Mr. Roman's first request for an adjournment of sentencing. We have conferred with Assistant U.S. Attorney Michael Krouse, who indicated that the government consents to this request.

*Sentencing is adjourned to
February 24, 2020, at 11:00 a.m.
Defendant's submission is due
February 13. Government submission
is due February 18.*

Respectfully submitted,

/s/ Heather Han

Michael Tremonte
Heather Han

cc: All Counsel of Record (by ECF)
United States Probation officer Jill Jefferies (by email)

SO ORDERED: N.Y., N.Y. 1/7/20

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.

90 Broad Street | 23rd Floor | New York, NY 10004

www.shertremonte.com | tel. 212.202.2600 | fax. 212.202.4156